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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

17 UNITED STATES OF AMERICA,

18 Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant.

) CASE NO. 20-CR-00249 RS

) STIPULATION AND [PROPOSED] ORDER
 19 CONTINUING STATUS CONFERENCE

20 This matter is currently set for a status conference on March 9, 2021, at 2:30pm. Since this
 21 Court ruled on defendant's Motion to Compel via an Order entered on January 26, 2021, the government
 22 has continued to produce discovery. The government's most recent production was sent to the defense
 23 on February 1, 2021. The defense team is currently reviewing those materials. The government is
 24 currently processing and preparing its next production of documents.

25 The discovery in the case is voluminous, and the parties request an approximate 60-day
 26 continuance in order to provide the defense with the opportunity to continue to review these discovery
 27 materials, and for the government to continue producing documents. The parties also request that the
 28 Court exclude time from the Speedy Trial Act deadlines on the basis that the proposed continuance will

1 allow for the effective preparation of counsel. The parties agree that the ends of justice served by this
2 continuance outweigh the best interest of the public and the defendant in a speedy trial. The parties
3 further agree that the failure to grant this continuance would unreasonably deny counsel for defendant
4 the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5 Accordingly, the parties agree that the period from March 9, 2021 through May 12, 2021, or the date of
6 the continued Status Conference, should be excluded in accordance with the provisions of the Speedy
7 Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking
8 into account the exercise of due diligence.

9 IT IS SO STIPULATED.

10 DATED: March 3, 2021

Respectfully submitted,

11 STEPHANIE M. HINDS
12 Acting United States Attorney

13 /s/
14 ANDREW F. DAWSON
15 Assistant United States Attorney

16 ZUBER LAWLER & DEL DUCA LLP

17 /s/
18 BRIAN J. BECK
19 Attorney for Defendant

20 [PROPOSED] ORDER

21 For the reasons stated in the stipulation of the parties above, and for good cause shown, the Court
22 hereby orders that the Status Conference currently set for March 9, 2021 is vacated and reset for May
23 12, 2021, at 2:30 p.m. It is further ordered that time is excluded, pursuant to 18 U.S.C. §§ 3161(h)(7)(A)
24 and (B)(iv) through May 12, 2021.

25 DATED:

26 HONORABLE RICHARD SEEBORG
27 United States District Judge